

Exhibit 3

From: [Joe Hellerstein](#)
To: [Rosenthal, Jeffrey A.](#); [Levander, Samuel](#)
Cc: [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Saenz, Andres](#); [Mgaloblishvili, Leila](#); ricleary@proskauer.com; [Komaroff, William C.](#)
Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)
Date: Sunday, May 9, 2021 10:48:07 AM

We hope to update soon. Meanwhile, please note that the firm of Hellerstein & Co. is representing Perfectus – not APM.

From: [Rosenthal, Jeffrey A.](#)
Sent: Wednesday, May 5, 2021 2:43 PM
To: [Joe Hellerstein](#); [Levander, Samuel](#)
Cc: [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Saenz, Andres](#); [Mgaloblishvili, Leila](#)
Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Thank you, Joe. We obviously would like to understand how you have not even begun a review but only now first discovered that the documents are encrypted when this production was due months ago, and we were advised by Proskauer in mid-March that you were taking over responsibility for the production. We remain eager to work this out directly with you rather than have the Court address yesterday's letter, but our patience to wait indefinitely has run out under the circumstances.

For your convenience, we are attaching another copy of that letter, which you received (along with exhibits) via ECF yesterday.

Best regards,

Jeff

Jeffrey A. Rosenthal
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From: Joe Hellerstein <jzh@hellerstein-law.com>
Sent: Wednesday, May 5, 2021 7:05 AM
To: Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Levander, Samuel <slevander@cgsh.com>
Cc: Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>
Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Jeff, Sam,

We just now finished downloading all the documents and discovered that the documents are encrypted. We are in the process of obtaining the necessary codes, so we can access the documents and begin our review. I hope to be in a position soon to give you an idea of timing. Thanks for your patience.

Joe

Joseph Z. Hellerstein
Hellerstein & Co.
Israel 972-52-420-1114; US 561-367-2569

From: [Rosenthal, Jeffrey A.](#)
Sent: Friday, April 30, 2021 1:26 AM
To: [Levander, Samuel](#); [Joe Hellerstein](#)
Cc: [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Saenz, Andres](#)
Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Joe,

Following up on Sam's text of last night. As you can imagine, we are eager to receive your clients' documents, which we believed were imminent at the time counsel was replaced. Given the amount of time that has passed since the Court ordered their production, and the circumstances surrounding Proskauer's replacement, we are prepared to bring your clients' non-compliance with the Court order to Judge Wang's attention if we are unable to get engagement from you and a commitment to an immediate production.

Best regards,

Jeff

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From: Levander, Samuel <slevander@cgsh.com>
Sent: Wednesday, April 28, 2021 10:38 PM
To: Joe Hellerstein <jzh@hellerstein-law.com>
Cc: Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>

Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Joe,

Please let us know when your clients will complete their production of documents responsive to Vale's subpoenas in compliance with the Court's Orders dated July 20, 2020, granting Vale's requested discovery from your clients (ECF No. 45), and January 29, 2021, rejecting your clients' motion to quash (ECF No. 76).

The January 29 Order required that your clients respond to the subpoenas by February 5, 2021. If you commit this week to complete your production by a mutually agreeable date in the very near future, we will refrain from taking further actions with the Court.

Best regards,
Sam

Samuel Levander

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From: Joe Hellerstein <jzh@hellerstein-law.com>

Sent: Wednesday, April 28, 2021 4:22 PM

To: Levander, Samuel <slevander@cgsh.com>

Cc: Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>;

Balter, Emily <ebalter@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>

Subject: RE: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Sam:

I prefer that you send me, in writing, any questions you would like me to address. Thanks.

Joe

From: [Levander, Samuel](#)

Sent: Tuesday, April 27, 2021 4:39 PM

To: jzh@hellerstein-law.com

Cc: [Rosenthal, Jeffrey A.](#); [Vicens, Elizabeth \(Lisa\)](#); [Balter, Emily](#); [Saenz, Andres](#)

Subject: In re Application of Vale, 20-MC-199-JGK-OTW (S.D.N.Y.)

Joseph,

We represent Vale S.A., Vale Holdings B.V., and Vale International S.A. in the above-captioned

matter. We understand that you now represent Perfectus Real Estate Corp. and Tarpley Belnord Corp. in connection with their ongoing discovery obligations in this case.

Please let us know your availability for an initial call this week.

Best regards,
Sam

Samuel Levander

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